

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

IN RE: ROBERT P CARR JENNIFER L CARR Debtors	Case No. 18-11673-pmm
Freedom Mortgage Corporation, Movant	Chapter 13
vs. ROBERT P CARR JENNIFER L CARR Respondents	11 U.S.C. §362

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Freedom Mortgage Corporation has filed a Motion for Relief from the Automatic Stay with the Court to permit Freedom Mortgage Corporation to Foreclose on 1403 Beverly Hills Road, Coopersburg, PA 18036.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before November 16, 2021 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC

8757 Red Oak Boulevard, Ste 150
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on November 23, 2021 at 10:00am in Courtroom 4th floor , United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Suite 103, Reading, PA 19601. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: October 27 2021

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

IN RE:
ROBERT P CARR and JENNIFER L CARR

Freedom Mortgage Corporation,
Movant

vs.

ROBERT P CARR and JENNIFER L CARR,
Debtor

Case No. 18-11673-pmm
Chapter 13

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Motion, Response Deadline And Hearing Date has been electronically served or mailed, postage prepaid on October 27, 2021 to the following:

ROBERT P CARR
1403 BEVERLY HILLS ROAD
COOPERSBURG, PA 18036

JENNIFER L CARR
1403 Beverly Hills Road
Coopersburg, PA 18036

MICHAEL MCCRYSTAL, Debtor's Attorney
McCrystal Law Offices
326 Main Street
Suite 1
EMMAUS, PA 18049

Scott F. Waterman, Bankruptcy Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Andrew Spivack

Andrew Spivack
(Bar No. 84439)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road, Suite 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x3017
Facsimile: 704-369-0760
E-Mail: PABKR@brockandscott.com

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PRAECIPE TO RELIST MOTION FOR RELIEF

TO THE CLERK, UNITED STATES BANKRUPTCY COURT:

Kindly relist for hearing Movant Freedom Mortgage Corporation's Motion for Relief originally filed with the Court on July 14, 2021.

/s/ Andrew Spivack
Andrew Spivack
(Bar No. 84439)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road, Suite 130
Mount Laurel, NJ 08054
Telephone: 844-856-6646 x3017
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